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ABSTRACT

The National Framework for the Recognition of Training (NFROT) is one of the key structures underpinning training reform in Australia. NFROT's basic principles and fundamental purposes are supported by almost everyone involved with the framework, and there is strong evidence that NFROT has provided considerable benefits to providers and learners alike. Despite these benefits, NFROT's implementation has been plagued by several serious flaws, including the following: confusion regarding the extent to which a "national" system exists; inconsistencies of approach; difficulties of "product recognition"; bureaucratization without quality assurance; confusion about the most appropriate role for industry; and the system's inability to deal with a range of types of training. The following are the paramount issues facing NFROT: whether a national system or nationally consistent system is needed; whether all courses, training programs, and providers should be treated identically; and the extent of regulation required to ensure quality assurance. It is recommended that the system be reformed by exercising one of three options for structural reform (a single authority, model legislation, legislative consistency) and by focusing on providers, improvement, or consistent criteria. (Appended are NFROT's 31 principles and an annotated list of 8 related reports, decisions, etc. The paper contains 27 references.) (MN)

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ED 419 993

When rhetoric meets reality

Issues confronting the National Framework for the Recognition of Training

Geof Hawke
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Issues confronting the National Framework for the Recognition of Training

A paper prepared for the Review of the ANTA Agreement

February 1996

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Executive summary

The National Framework for the Recognition of Training (NFROT) is one of the key structures underpinning training reform, and all key stakeholders recognise that it needs to operate effectively. The basic principles on which the framework has been built and its fundamental purposes are strongly supported by almost all who are involved with it.

There is strong evidence that NFROT has provided considerable benefits to providers, has expanded the range and number of providers participating in the Vocational Education and Training (VET) system and has increased the opportunities for learners to access it. Furthermore, in establishing this framework, the VET sector has attempted to provide a nationally-consistent strategy for course and provider recognition with full mutual recognition—something that has never been attempted in the school sector or in higher education.

Despite these benefits, the implementation of NFROT has a number of serious flaws. These include a lack of clarity as to the extent to which there is a "national" system, inconsistencies of approach, difficulties of "product recognition", bureaucratisation without quality assurance, the lack of clear definitions for the Australian Qualifications Framework (on which NFROT relies), some confusion about the most appropriate role of industry, and the inability of the system to deal with a range of types of training.

The history of NFROT has been one in which thorough preparation and planning have been absent. The imperatives of political, economic and industrial concerns have precipitated a raft of changes, amendments and adaptations: a situation described as "occasional bursts of legislative heroism". These changes have been of minor consequence for some providers, but have had a major impact on others. The overall effect has been a gap between the rhetoric of what stakeholders were led to believe would be achieved and the reality of what NFROT has been able to provide. The changes to NFROT principles and practices have often been developed by people with a low level of understanding of education and training principles. As a result they have served to confuse and confound rather than illuminate and simplify.

The issues which we see as paramount are:

- whether there should be a national system or a nationally-consistent system;
- whether there should be identical treatment of all courses, training programs and providers;
- the extent of regulation to ensure quality assurance.

While we recognise the strength of the views of those who believe that the system is so fundamentally flawed as to be beyond reform, we take the view that to abandon NFROT would be to signal to all stakeholders that the entire reform agenda should be abandoned. To do so would be to jettison the benefits that have been achieved.

For that reason we suggest options for reforming the system. We warn, however, that further changes need to be carefully and effectively managed. In particular, it is critical that decisions are based on sound knowledge and have the full and active support of those stakeholders who will actually implement them.

Three options for structural reform are outlined:

> *A single authority*—a national authority managing the recognition process;
> *Model legislation*—State recognition authorities operating under a common legislative framework;

Legislative consistency—State recognition authorities operating under nationally-agreed principles within State legislation.

In addition, three possible approaches to regulatory arrangements are described:

Focussing on providers—changing the emphasis from regulating courses to regulating providers;
Focussing on improvement—shifting the focus of regulation from the initial documentation for accreditation of a course towards monitoring actual course delivery;
Focussing on consistent criteria—developing clear and detailed guidelines.

Many of the issues raised in this review have been raised in previous reports. The fact that they are being said again here may say a great deal about either the difficulty of modifying the current system, or the unwillingness of key stakeholders to confront difficult issues. Our suspicion is that it is the latter problem which underpins our concerns and requires the most immediate response.

Introductory comment

This paper provides a brief examination of the National Framework for the Recognition of Training (NFROT). It is intended to provide the Review of the Australian National Training Authority (ANTA) Agreement with some options for responding to concerns which have been expressed about the effectiveness of the NFROT Agreement and its subsequent implementation.

The paper does not attempt to provide a detailed analysis nor to address many matters of fine detail. By focussing on the large-scale issues we do not mean to imply that the many matters of detail that are not referred to here are of lesser importance. On the contrary, it is our view that failure to consider the details of implementation properly has contributed significantly to the level of concern.

The reason why this paper seeks to identify the key macro-level issues is because these are the ones that most strongly affect the operation of the system; it then proceeds to identify a range of possible directions in which further action could be pursued.

1. Background

Among the many recent changes to Australia's systems of vocational education and training, the agreement of State, Territory and Commonwealth Ministers to adopt the National Framework for the Recognition of Training (NFROT) has been widely seen as one of the most significant.

The Agreement, which came into effect on 1 August 1992, was one of the keystones supporting the introduction of a competency-based system of vocational education and training (VET) in Australia. Until that date, Australia's States and Territories had operated VET systems which were focused almost entirely around publicly-funded TAFE providers and apprentice training arrangements. Not only was there little coordination between States as to the qualifications they provided, the criteria used to define these or the arrangements necessary for courses to receive public recognition, even within States, there was little coordination between the TAFE and apprenticeship systems.

Further, the growth in demand for VET which was proposed by governments, unions and employer organisations was unlikely to be achieved solely through reliance on the publicly-funded TAFE system. A significant change was required and governments were prepared to consider radical alterations to the existing culture.

1.1 Towards the NFROT Agreement

In the period from the mid-1980s a number of attempts were made to provide for a more cohesive and consistent approach to the development of courses, their accreditation and the system of qualifications. These included the creation of the Australian Council on Tertiary Awards in 1985 and its replacement in 1987 by the Register of Australian Tertiary Education. These systems provided for a set of nationally-consistent course descriptions which defined four levels of accredited award courses and their associated credentials. Both systems involved a consistent set of qualifications which operated across both the VET and Higher Education sectors. A key feature of both sets of guidelines was that the duration of a course in hours and its educational entry requirements were key criteria used to assess the level of qualification to be awarded. As the move towards competency-based education in the VET sector involved a deliberate shift away from defining courses using these features

towards one which emphasised the outcomes of a course, these arrangements became unacceptable.

In parallel with these developments, TAFE systems established cooperative arrangements which sought to maximise the national consistency of courses on offer. Initially, the attempt was focused on identifying the "common core" of courses in particular occupational areas. Subsequently, the TAFE systems agreed to establish the Australian Committee on TAFE Curriculum (ACTC) with a brief to develop courses on a national basis. Staffed and resourced through the pooling of funds from the State and Territory TAFE systems and additional support from the Commonwealth, ACTC initiated a series of national curriculum development projects which continue to the present day. This body later became the Australian Committee for Training Curriculum (ACTRAC) when its brief was extended to cover all VET provision. While both ACTC and ACTRAC projects have often produced high quality products, their take-up nationally has been significantly less than was anticipated. The reasons for this are complex but a continuing reluctance to implement "other people's courses" has been an important factor.

The difficulties which existed with qualifications and recognition arrangements were apparent by the beginning of the decade. In addition, the proposals to introduce competency-based education and training, the moves towards creating a training market, the greater role being played by industry and a host of industrial and economic pressures all coalesced to encourage the development of a new approach. VEETAC, the senior advisory body for the Ministers of VET, established a Working Party to prepare proposals for a new system of course accreditation and provider recognition. The proposals were formulated over a long period which involved considerable (though often hurried) consultation with key players and regular re-working of the proposals to satisfy the interests of the wide-range of stakeholders involved. Stakeholders, however, expressed concern at the time, that the consultation process did not provide the opportunity for considered, reasoned, input.

1.2 The influence of the political, industrial and economic climate

The period in which the original negotiations occurred was one in which a sense of urgency dominated many of the forums. The essential starting points of the Training Reform process lay in fears that Australia was losing its international competitiveness, its quality of life and its economic security. Government, unions and employer bodies for their differing reasons had all placed a great degree of reliance on the reform of the training system as one of the lynch pins of economic and industrial reform

Each of the social partners had risked a great deal by relying on VET reforms providing tangible benefits in the short-medium term. A climate of "make a decision and get the details right later" came to prevail. Moreover, there were strong political pressures operating on the process which required that, regardless of the soundness of the proposition, certain outcomes had to be included within the rhetoric. Unions involved in the negotiations argued strongly for a national system. They wanted to achieve a high degree of uniformity of both process and outcome. The Commonwealth also supported a national system. State governments, however, doubted the need for a uniform national approach. Thus, as a compromise position, the Framework promised to deliver "national consistency" even though it was probable that several States would retain features of their existing arrangements which were not consistent with the national agreement.

Similarly, as governments had given strong political support to increasing the role of industry in the VET system, government representatives were unwilling to oppose the

position of the industrial parties who insisted on the pre-eminent position of industry competency standards as the basis for assessment and reporting. This was despite the fact that State agencies did not intend to change their recording and reporting practices.

Put in blunt terms, then, the Framework was to a substantial degree a political compromise which resulted from complex, lengthy and, at times, tough negotiations. Each of the negotiating parties had substantial interests invested in achieving a "win" and this ethos dominated the process.

1.3 Too much haste, too little thought

The process of training reform has been characterised by considerable haste and lack of informed discussion by those with appropriate expertise. Despite the, often lengthy, consultations which occurred prior to the initial agreement, the decision-making processes have been typified by pressure and urgency. In some cases decisions have been made and then followed by further decisions, without waiting for the initial decisions to be implemented. In addition, it can be reasonably said that the level of understanding of education and training principles of many involved in decision-making has been quite low, and this has tended to lead to many discussions in which there was much heat but little light. This problem still exists.

We know a great deal about the management of change but little of this has been reflected in the manner in which NFROT (or much else of training reform) has been implemented. For example, we know of the importance of ensuring that the beneficial outcomes of change are well-known to those who will be required to implement the change and that they understand and support the change. In the few instances where an attempt to develop clear and detailed resolution of an issue has occurred, the process has more often been focused on achieving an outcome than on actually resolving the issue. In these cases, those who have seen themselves as "losers" have simply sought means of ignoring the decision.

Reviews consistently show that NFROT is little known or understood by many of those in enterprises or in educational institutions. Indeed, one of the consistent themes to emerge from studies of the implementation of training reform has been that negotiations on issues such as NFROT have been dominated by national peak bodies such as the ACTU, ACCI and BCA. There has been little direct involvement by their State affiliates or their individual members.

A consequence of the sense of urgency has been that key decisions have often been taken by Ministers with little likelihood of their being adopted in practice. The targets set by Ministers have often exacerbated the position as agencies at national and State levels seek to satisfy the targets in appearance if not in reality. Considine[1] has succinctly summed up this sort of situation as "occasional bursts of legislative heroism." As one example, Ministers agreed to a proposal from their advisers that accreditation agencies should operate on a 21-day turnaround time for accreditation applications. Difficulties in implementing this proposal led to accreditation agencies redefining their "turnaround period" so that it appeared to meet the Ministerial requirement. In practice, almost nothing was affected.

Further difficulties arise in the differing histories and demographics of States and Territories and changes in the political complexion and philosophy of their governments. We suspect, however, that because so many decisions have been taken quickly, differences have

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1 Considine, Mark (1994) *Public policy: A critical approach.* Macmillan, Melbourne. p. 253.

tended to arise more from key individuals at both State and national levels having a disproportionate influence on the shape and practice of NFROT, than because of legitimate differences between States. As these individuals have moved on or been re-assigned, policy and practice has often changed in their wake. Again, the effect has been to introduce further uncertainty and inconsistency.

For example, decisions made by accrediting agencies and those to whom they have delegated self-accreditation status have varied widely simply because they understand the words of the agreement differently. The clearest example is the widely differing understanding of "competency-based training". A decade after it was first proposed, the concept is today subject to a wide variety of interpretations. The differing understandings include issues relating to

- delivery methods (some regard self-pacing as a defining characteristic of CBT, others see it only as one possible delivery method)
- the role of industry standards (e.g., standards are sometimes seen as benchmarks while others believe they completely define the outcomes of training
- what outcomes are reported (most providers report achievement of modules, some report the achievement of each of the learning outcomes, while some VEETAC reports require that reporting be by units of competence).

1.4 The principles and objectives of NFROT

The final agreement (known as the National Framework for the Recognition of Training, NFROT) had six principal objectives:

- to provide for national consistency in the recognition of accredited courses, training programs, training providers and competencies held by individuals,
- to provide nationally consistent outcomes for vocational education and training courses and training programs,
- to involve the industrial bodies in the accreditation process,
- to provide mechanisms by which government, commercial, industry and community-based providers of vocational education and training may be recognised,
- to provide for the establishment of mechanisms for the objective assessment of competencies held by individuals, and
- to provide for the recognition of prior learning in a manner which is consistent and fair.

It was organised around a set of thirty-one principles, which are set out in detail in Appendix 1. The principles cover the areas of:

- Course Accreditation (10 principles)
- Credit Transfer (5 principles)
- Provider Registration (6 principles)
- Assessment (5 principles) and

- Recognition of Prior Learning (5 principles).

Most of these principles are unexceptional and either have been implemented or are on the way to implementation. They are not the cause of the problems of NFROT, except perhaps in their level of generality.

1.5 The changing face of NFROT

Since the original Agreement, a number of reports, reviews and projects have been conducted which have directly or indirectly impacted on the nature of the agreement and its operation. These are summarised below, and more detail is provided in Appendix 2.

Many of the changes recommended in these reports have been implemented only in part and, in a number of cases, reports have had a wider circulation than the subsequent decisions by the relevant Ministerial Council. This, added to the regularity and magnitude of some of these changes, has created a climate of uncertainty. Moreover, it has meant that many providers have found that they have commenced course development under one set of rules only to find that their proposal is finally judged according to a quite different set of criteria. Many have simply pulled out, regarding it as "all too hard".

The overall effect of the constant change to the system has been, as one senior VET administrator described it to us, a problem of "brand recognition". Almost no aspect of the system has remained constant long enough for any of its "customers" to develop any understanding or loyalty to the services the recognition system provides. It is no surprise, then, that report after report identifies inadequate or non-existent understanding of the system as a key issue requiring action. It is time, now, for the action.

1.6 The Australian Qualifications Framework

A critical development noted above has been the introduction of the Australian Qualifications Framework (AQF). This framework provides a linchpin for training reform. It creates a system of qualifications in the VET sector which are based on competencies, and thus reinforces the range of other changes which have been introduced. It allows for a considerably more flexible approach to course design by breaking the nexus between course levels and the duration or entry requirements of courses that existed under the RATE guidelines.

Nevertheless, the implementation of the AQF has been a further example of critical decisions being taken in advance of clear thinking and widespread understanding and acceptance. The AQF is a single framework in name only. There is no consistent definition of qualifications across the three sectors involved and, indeed, there appears to be no consistent commitment to the framework itself. For example, though the framework became operative only in January, several universities are already developing qualifications—Associate Degrees—which are not included within the Framework.

Reports, reviews, projects and changes related to the National Framework for the Recognition of Training (NFROT) 1992-1995

September 1992	ACTRAC User's Guide to Course Design for Competency-Based Curriculum	A standard format for documenting competency-based courses which was subsequently used by most State agencies.
July 1993	First Review of NFROT "Rumsey Review"	A review which identified many concerns and proposed a number of changes to the operations of NFROT.
December 1993	The Australian Qualifications Framework (Introduction delayed until January 1995)	A revised system of qualifications which, in the VET sector, are aligned with the Australian Standards Framework. (see also below)
1994	ACTRAC User's Guide to Course Design for Competency-Based Curriculum 2nd Edition	A revised and expanded version of the 1992 guide with a more detailed explication of the NFROT principles.
June 1994	Successful Reform "FitzGerald/Allen Review"	A broad review of training reform. The report noted a number of continuing concerns with NFROT and recommended some significant and urgent changes be made.
September 1994	Meeting of recognition authorities	Endorsement by Ministers of a number of changes to the operation of NFROT agreed to at a meeting of the State/Territory authorities. These involved: • common application forms for accreditation and recognition • incorporation of "short courses" • a national code of practice • a national protocol for registering providers who operate across borders • mutual recognition arrangements
November 1994	Proposals for More Effective Implementation of Training Reform	Proposals based on the Allen Report agreed to by Ministers on the recommendation of ANTA, including redefining agencies' roles towards QA & facilitation rather than regulation, and the threat to take legislative action if required.
November 1994	NETTFORCE and the new Traineeships	A structure which expedited the establishment of work-based Traineeships at ASF levels 1 & 2. The urgency of this has led to a parallel accreditation process.
July 1995	Establishment of Standards and Curriculum Council	A semi-independent Council with responsibility for: • competency standards • national curriculum • VET aspects of the AQF • recognition of training (NFROT) • assessment

More fundamentally, however, the descriptors of qualifications which form the core of the Framework are broad and unclear. Consequently, the AQF has considerably increased the inconsistencies of interpretation now operating across the country. Of particular concern has been the "credentials creep" as long-standing occupational qualifications have suddenly reappeared at higher levels.

Further exacerbating this situation, recognition authorities are required by the Framework to rely on advice from industry as to the relevant ASF level (and hence qualification level) for a particular course. Experience to date has shown that there remains considerable variation in the understanding of industry as to the interpretation of the ASF. Further, it appears that differing assumptions are being made about the criteria which are set out in the AQF Guidelines, and the interpretation of them. Moreover, the very different concept of a qualification not based on duration appears to be neither widely understood or endorsed. This has led to substantial anomalies in the levels of qualifications being accredited both within and across States.

A particular concern noted by many commentators is that the AQF provides little or no clarity as to the appropriate accreditation status of courses which do not lead to the achievement of industry competency standards. These include basic education courses, language and literacy courses and vocational preparation courses which do not target single industries or occupations. Recognition authorities have adopted a range of different responses to this anomaly.

As the implementation of the AQF has progressed, it has become increasingly clear, as submissions to various reviews have attested, that concern and disenchantment with the AQF is growing. These concerns go beyond the detail of the implementation to the fundamental principles on which the AQF is built. A clear example is the Business Council's 1994 Statement that:

> "official policy should recognise the distinction between being qualified and being competent. The appropriate concept is
>
> Being Qualified + Successful performance = Being Competent."[2]

Other significant stakeholders, like the BCA, do not appear to be comfortable with the significant shift in the nature and meaning of a "qualification" which the AQF has introduced. Historically, there has been a distinction between being trained to do a job and being regarded as a competent worker. This has been true in both the trades ("getting your ticket" only came some time after completing a TAFE qualification) and the professions (lawyers receive the "practice certificate" some time after receiving their degree). There appears to be a general community perception that this is acceptable and, as a result, a sense of unease with a system based on a different premise.

It is our view that there is an urgent need for a rethinking of the system of qualifications which operates in the VET sector and its relationships with the qualifications of other sectors. This reappraisal needs to proceed before further confusion and uncertainty is created. We discuss this further in section 3.3, below.

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2 Business Council of Australia (1994) *Refocussing Training Reform*. BCA, Melbourne. p.37.

2. Fundamental questions

NFROT was intended to provide a much improved set of arrangements and, at the same time to satisfy a wide range of new needs. Moreover, it was assumed that a common understanding existed about the essential nature of these needs. Subsequent experience has shown this optimism to be unfounded. Probably the most striking example of this is the issue of reciprocal recognition. The promotional material prepared subsequent to the Ministerial agreement indicated that all State authorities would "recognise decisions of other recognition authorities." The industry stakeholders understood that this would mean that any course accredited in one State was automatically and immediately given identical status in all States and Territories. State and Territory governments interpreted this to mean that a course accredited in one State could, on application to another State, be granted accreditation provided it also satisfied the requirements of that second State. As requirements varied considerably, this was often not a trivial exercise.

It is important to emphasise that, while criticism of the system and concern about NFROT's failures are loudly and often expressed, the most fundamental reaction of stakeholders is strong support for the essential purpose and nature of the Framework. This was neatly summed up in a recent report by the NCVER:

> "In general [they] were supportive of the reasons underlying provider registration and course accreditation. However, they were extremely hostile about what they perceived as the cumbersome, time-consuming and complex procedures involved."[3]

It is also important to recognise that NFROT has attempted to do something in the VET sector—that is, provide a nationally-consistent arrangement for course and provider recognition with full mutual recognition—that has never been attempted, let alone succeeded, in the school sector or in higher education.

In the sections below we provide an overview of what we believe are the key issues which need to be resolved. We have avoided becoming engaged with the many details where changes, adjustments or modifications might usefully be applied. Rather we have addressed the issues which we believe principally underlie the difficulties being experienced. The issues are often intertwined and, while we have sought to deal with each separately, some overlap will inevitably be found. A consistent feature, however, is the gap between the rhetoric of what stakeholders were led to believe would be achieved and the reality of what NFROT has been able to provide.

It should be noted as well that, in perhaps differing ways, many of these have been raised in previous reviews (Rumsey (1993), Allen Consulting Group (1994)). The fact that they need to be addressed once more says a great deal about the unwillingness of key stakeholders to confront difficult issues which has typified much of the process of training reform in Australia.

2.1 Issue 1: A national system or a nationally-consistent system?

From the earliest phase of discussions which led to the NFROT Agreement, a threshold issue has been the degree to which NFROT ought to be a national system which operates through local agencies or a locally-managed system operating within a nationally-agreed framework.

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3 Barnett, Kate (1995) *Australian industry and enterprise training providers*. National Centre for Vocational Education Research, Adelaide.

Though agreement was reached on the form of words to be adopted, this fundamental issue has never been resolved. It lies at the heart of the problems of NFROT.

a. Background

NFROT is described as "a comprehensive set of changes"[4] which would "meet the need for consistent recognition of vocational education and training across Australia."[5] The agreement to aim for "consistency" rather than identity of process resulted from a keen debate within the VEETAC Working Party. The process agreed to achieve this was that "all decisions of State and Territory recognition authorities ... made in terms of the Framework correspond with the guiding principles [and, as well] there are regular meetings of recognition authorities to ensure national consistency."[6]

In the same document (p.7), however, the Framework is also described as "a national system". Further, in a separate agreement, the Ministers identified the development of "a national vocational education and training system in which publicly funded, private and industry providers can operate effectively" as the first of the National Goals for VET in Australia."[7]

To emphasise the national nature of the system, marketing material stated that courses and training programs accredited under the Agreement would be "recognised nationally" as would the skills of those undertaking these courses. A logo whose use would be "strictly controlled" [8] would identify such training. In fact, "all training providers can ... be registered to conduct these courses and training programs anywhere in Australia. ... accreditation, recognition and registration granted in any one State or Territory are recognised by every State and Territory."[9] This would be achieved because "Since 1 August 1992, ... State and Territory recognition authorities recognise decisions of other State and Territory recognition authorities."[10]

ACTRAC was established to provide "national curriculum" and has produced a substantial volume of curriculum material through its various projects.

State and Territory governments have adopted a range of different approaches to the funding of their recognition authorities. Some expect the agencies to be substantially self-funding. Others do not. This means substantially different fees charged for the same outcomes.

Through a range of national programs including the AVTS and NETTFORCE, a degree of national accreditation is actually being achieved. Examples of this are the traineeship programs in the Office Skills and Automotive areas.

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4 VEETAC Working Party on the Recognition of Training (1992) *Nationally Recognised Training: Bringing it Together.* p.1

5 Ibid p.2

6 Ibid p.9

7 VEETAC (1992) *National Goals for Vocational Education and Training in Australia.* VEETAC Secretariat, Canberra.

8 VEETAC Working Party on the Recognition of Training (1992) *Nationally Recognised Training: Bringing it Together.* p.3

9 Ibid p.3

10 Ibid p.9

b. Key outcomes

- There remains a high commitment by stakeholders to the principles and fundamental purposes of NFROT. Despite this, the gap between what key stakeholders understood was promised by NFROT and the reality they experience has engendered a view that NFROT has failed.
- The introduction of NFROT has led to greater consistency in both process and outcome of accreditation and recognition than existed before 1992. Supportive legislation introduced by States/Territories has, however, largely maintained distinct arrangements rather than reflecting common structures, processes or criteria. Moreover, the "regular meetings of recognition authorities" have not ensured national consistency at the level expected by key stakeholders.
- An unintended "market" in accreditation has come to exist with providers shopping around to find the cheapest or easiest State in which to gain accreditation.
- Differences of interpretation and differing degrees of commitment by States/Territories to details of the original agreement and subsequent amendments have led to significant differences between the practices of States and Territories. Many of these are not explicable in terms of differing State environments.
- A key failure has been the lack of automatic reciprocity. Recent changes agreed by recognition authorities appear to be addressing this issue.
- There is widespread dissatisfaction that decisions made under the terms of the agreement are greatly inconsistent within and between States. This has been particularly in regard to such matters as whether or not a course satisfied accreditation requirements, the detail of documentation required, and the treatment of nationally-developed modules.
- Rather than foster a common feeling of ownership of the system, failure to come to terms with basic differences has reinforced divisions.
- Inconsistency has significantly increased since the introduction of the AQF.

c. Discussion

The core issue of whether recognition of training arrangements should be national or only "nationally-consistent" remains unresolved. Broadly, the Commonwealth and the industrial parties have strongly supported a national system while State and Territory governments have argued for the constitutional authority of the States.

There appear to be good grounds to doubt that all States/Territories are fully committed to all the details of the Agreement.

Models in which States retain their authority but agree to operate under a single administration can be found in areas such as rail freight. There is a need to explore the commitment of governments by seeking a clear and unambiguous declaration on this key issue.

d. Possible further action

- Model legislation and related regulations be prepared for consideration by Ministers to permit matching legislation to take effect in each State and Territory. Any decision of

governments should be binding on all government agencies including licensing authorities.

- Failing this, Ministers agree to clearly define those aspects of NFROT which will be applied uniformly and those which will be subject to State by State variation.
- Consideration be given to empowering the Standards and Curriculum Council to accredit courses within categories agreed to by Ministers (e.g. those developed nationally, AVTS, etc.).

2.2 Issue 2: A framework to serve many interests

The NFROT Agreement sought to provide a consistent system within which courses and training programs of whatever kind were judged by consistent criteria and in which public, private and industry providers were offered equality of status.

a. Background

The Framework was meant to integrate the range of accreditation and qualification systems then in place. In particular, the system was intended to take all forms of on-the-job and off-the-job VET into account[11]. Because of the differing legislative requirements in States and Territories, it was left to States to choose their own approach to implementation. It was expected that this would lead to a consistent national approach, but that it would take some time to occur.

> "The Framework also provides for the recognition of non-industry based courses and training programs, ranging from tertiary preparation courses, through courses in art appreciation, to adult literacy courses."[12]

> "It enables both public [TAFE and schools] and private training providers [including enterprises, commercially run colleges, community providers, licensing authorities and professional associations] to deliver nationally recognised training [through] formal recognition of courses, training programs, training providers and competencies [which provide] industry, government and the community with an assurance about the quality of training."[13]

Especially important was the need for qualifications to be a respected currency, which would need both face validity and a clear belief in their value. To quote VEETAC:

> "an employer can be confident that a person with a nationally recognised certificate or statement of attainment can capably perform the specified competencies regardless of where the skills were acquired."[14]

VEETAC also emphasised the significance of competency standards as a basis for qualifications:

> "The Framework will use [NTB-endorsed competency] standards as the basis for recognition.[15]" This would ensure that "individuals with recognised training qualifications know that their training program meets industry's training standards

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11 see VEETAC Working Party on the Implementation of Competency-Based Training (1992) *The Administration of Competency- Based Training.*

12 Ibid p.3

13 Ibid p.3

14 VEETAC Working Party on the Recognition of Training (1992) *National Framework for the Recognition of Training: A National Framework for a Competitive Australia* p.3

15 Ibid p.3

> because recognised training programs are based on competency standards expected in the workplace."[16]

Moreover, the Framework was intended to provide a structure which could incorporate licensing and related arrangements operated by other public instrumentalities and self-regulatory arrangements managed by professional associations. This was closely tied to the multi-lateral negotiations then emerging around the mutual recognition of occupational licensing. It was expected that the desired consistency of outcomes would result from that process.

As well, the range of curriculum provision would be broadened because the Framework would facilitate "a new and better approach to curriculum development that can integrate both on- and off-the-job training."[17]

From the point of view of students and trainees, the system would provide for considerable savings through recognising the skills already held by workers. In particular, that the Framework would provide "a structure for recognition of competencies gained both inside and outside the formal vocational education and training system."[18]

The AQF was introduced as the "final piece of the jigsaw". It had the purpose of providing a consistent and competency-based framework for all qualifications provided in post-compulsory education and training that would flow from NFROT.

b. Key outcomes

- The Agreement has, for the first time, provided a structure through which commercial, industry, community and enterprise providers could have their programs granted public recognition. This has been of substantial benefit to many individual learners.
- Many private providers have been registered. The take-up has been particularly strong among community providers and least strong among enterprises.
- Differing industry understandings of the ASF have led to increasing inconsistency in accreditation decisions concerning AQF qualification levels.

  While operating under the RATE guidelines, preparatory and other non-industry based courses and training programs were readily recognised. Since adoption of the AQF, the close linkage between qualifications and competency standards has meant that such programs are now problematic. Similarly, substantial courses offered by TAFE and designed to prepare learners for entry into occupations or industries are technically ineligible for an AQF qualification if they do not completely satisfy the industry standards. This "nicety" is, in practice, being ignored leading to further inconsistencies.
- Significant "credential creep" has occurred.
- Regulated training, including contracts of training, and the recognition of training for occupational licensing, largely remains outside NFROT.

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16 Ibid p.7

17 VEETAC Working Party on the Recognition of Training (1992) *Nationally Recognised Training: Bringing it Together.* p.8

18 Ibid p.3

- Recent arrangements under NETTFORCE have not fitted easily into NFROT systems and have forced a number of hastily thought out adjustments.
- In most States, TAFE systems have operated under a distinct set of procedures which differ from those applicable to other providers. As well, some other providers are now given self-accreditation powers and there are proposals to extend this further.
- There is a great disparity between stakeholders as to their expectations of what the system is meant to provide. In particular, differing priorities among competing objectives have reinforced the impression of some stakeholders that others are "hijacking" the system.

c. *Discussion*

While clearly there are advantages in a system which treats all its components in a consistent way, there is sufficient diversity of programs and providers included within the VET system to question a "one size fits all" approach. Is this either necessary or appropriate? For example, ought the concern to be for equality of outcomes rather than equality of process?

Three issues typify the problem. Firstly, there is continuing confusion over the status of the AVTS and its relationship to the rest of the system. The continuing inability to reach agreement on the place of contracted training within the overall VET system or the authority for the accreditation of this type of training, has contributed significantly to industry dissatisfaction. This has only been exacerbated by NETTFORCE developments.

Secondly, the failure to come to grips with the important distinctions between educational programs which prepare learners for workplace entry and those which lead to workplace competence has undermined the credibility of the system with many educationists.

Finally, workplaces (especially the great numbers of smaller enterprises) are increasingly indicating that training is not their core business and, while interested in some level of involvement, do not see themselves as part of the VET system.

Furthermore, the expected cost savings, through greatly increased recognition of skills developed outside formal systems, have not emerged both because the availability of this option is still relatively unknown in the community and because, in practice, RPL has not yet been implemented in cost-effective ways.[19]

d. *Possible further action*

- To ensure that any further action is based on accurate knowledge, the Standards and Curriculum Council should review and document:
  - the differing needs of classes of programs and providers (in order to provide recommendations for consideration by stakeholders)
  - approaches to maximise the involvement of small-to-medium size firms without them becoming part of the VET system
  - the low take-up rate of provider registration by many larger enterprises.

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[19] McDonald, R. (1995). *Recognition of prior learning. Report on Case studies.* Sydney, Assessment Centre for Vocational Education, NSW TAFE Commission.

- how much credit transfer is actually occurring or is sought; and the level of mutual recognition of courses/programs
- what exactly the recognition authorities are doing: what enquiries do they receive? what advice do they give? how many applications are received and how many accredited?
- quality assurance issues which apply to the various classes of courses/programs. (This should include non-industry courses, preparatory courses, those delivered wholly or principally in the workplace, contracted training and others to be agreed.)

- Reconsider the decision to establish a single qualifications structure for VET based on industry competency standards. While this would involve a fundamental reorganisation, it would address the different roles played by differing educational programs.

2.3 Issue 3: The extent of regulation

The system has promised to achieve both simplicity and a "guarantee" of quality outcomes. At the same time, the pressure on accrediting agencies has increased to reduce costs and decrease the time taken to accredit courses and recognise providers. Given the complex nature of quality education and training, it appears unlikely that both outcomes are achievable. It is necessary to clarify, now, what balance should be struck between the public responsibility to ensure quality and the community's willingness to pay.

a. Background

The Framework was introduced with high expectations of what could be achieved.

It was said to "provide industry, government and the community with an assurance about the quality of training."[20] To ensure the integrity of the system "all key features of the Framework have built-in, regular review mechanisms to ensure that the principles and processes are followed."[21] Some examples indicate that "The Framework streamlines course accreditation, training program recognition and training provider registration, making recognised training attractive to both industry and individuals."[22] Especially significant was the claim that the "cost-effectiveness of training recognition has been improved by simplified accreditation, recognition and registration arrangements."[23]. An important example was that "training providers only have to apply in one State or Territory for course accreditation, training program recognition and registration."[24]

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20 Ibid p.3

21 Ibid p.8

22 Ibid p.6

23 Ibid p.8

24 VEETAC Working Party on the Recognition of Training (1992) *National Framework for the Recognition of Training: A National Framework for Training Provider Prestige* p.2

The Framework would achieve a 'user-friendly' system in which it would be "easy to identify what accredited courses or recognised training programs are offered by registered providers, what credential they lead to and what they mean."[25]

b. Key outcomes

- The overall quality of VET courses and programs has, probably, increased. Nevertheless, minimum standards have fallen and there is a perception that much "rubbish" is being accredited.
- Many providers, both industry and commercial, have greatly appreciated the greater discipline the accreditation process has imposed on their course development. Most of these acknowledge it has greatly improved the quality of their training programs.
- There has been substantial and sustained complaint that the processes are clumsy, bureaucratic, time-consuming, inconsistent and inappropriate. However, attempts to address these concerns have frequently led to lower standards of quality assurance being adopted.
- A "National Register" of accredited courses and training programs has been created. The number of courses placed on the register, its relative inaccessibility, and uncertainty as to its status have meant that it is little used.
- The current processes are, substantially, "one-off". That is, little or no compliance auditing follows the accreditation of a course or the recognition of a provider. There is growing concern that the programs actually being delivered are not always to the standard that was submitted to the accrediting agency.

c. Discussion

There is a belief, expressed by some, that there is no need for regulation as market forces will provide sufficient quality assurance. This is an exceptionally naive view. The vocational education and training sector is one in which there is market failure, in that potential participants do not have the ability to make informed choices. In many cases the information that would enable them to discriminate between alternatives is simply not available; in other cases (for example, people living outside major cities) there is no real alternative; and in many cases the potential trainees are not equipped to make a rational decision.

The provision of a reliable quality assurance system must rest with governments. However, a number of difficulties are at the heart of the dilemma of how much regulation to provide.

Firstly, the interpretation of a "streamlined" accreditation system differed widely between those who were familiar with accreditation processes (many of whom subsequently ran the accreditation agencies) and those—especially in industry—who did not. The current processes are, in the main, simpler and more rapid than was true pre-1992. However, the need to ensure that programs are properly documented, supported by industry and comply with the principles of NFROT, is necessarily time-consuming.

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25 VEETAC Working Party on the Recognition of Training (1992) *National Framework for the Recognition of Training: A National Framework for a Competitive Australia* p.4

Secondly, the constant changes have undermined the already inadequate provision of information on NFROT to users of the system. Thus the initial misunderstanding has been compounded by growing confusion.

The failure of reciprocal accreditation has meant that many providers have needed to pay multiple accreditation costs. Moreover, the cost of accreditation to providers has been considerably higher than most had expected. Until clear benefits—in terms of their "bottom-line"—are demonstrated, many are reluctant to pay these fees. This reluctance is intensified for many who find that the cost in human and other resources of developing a program to the standard required by accreditation authorities, is considerable. While many accept that the process has provided them with greatly improved outcomes, others remain to be convinced.

d. Possible further action

- Give consideration to refocussing the system on a quality assurance approach. This could entail considering processes which reduce the initial level of checking but increases the level of subsequent compliance auditing.
- Commission a substantial review of the quality assurance procedures being used by accreditation authorities.
- Develop, and make widely available, clear guidance material on the processes, typical time frames, costs and benefits of developing courses to quality standards. The benefits should be based on real "bottom-line" outcomes and not marketing hype.
- Stakeholders need to discuss and reach agreement on the "level of certainty" that the NFROT process should provide. This should include consideration of more fully accepting the basic precepts of quality assurance rather than maintaining the current quality control regime. This could entail considering processes which reduce the initial level of checking but increase the level of subsequent compliance auditing.

2.4 Issue 4: The role of industry

a. Background

Industry, in the form of large enterprises and peak bodies, has been a significant and important player in training reform. Indeed, the needed reforms could not have occurred without this involvement, which has been largely constructive and positive, both by the commitment of industry and the reframing of the purposes of training that occurred.

b. Key outcomes

- Industry has been involved in setting competency standards, participating in accreditation and recognition processes, and in seeking both accreditation and recognition.
- Involvement by enterprises has generally been lower than anticipated. The greatest involvement has been that of peak organisations.
- Industry groupings are increasingly identifying a preference for active involvement rather than leadership of VET systems.

c. Discussion

The contribution of industry to reform so far has the defects of its own virtues, in that it has led many other stakeholders to envisage a continuing role for industry in policy formulation that we consider inappropriate. It must be remembered that no enterprise (apart from public and private training providers) has training as its core business. Training is one of many means by which enterprises achieve their business ends, and it is illogical to expect any enterprises to have the commitment to training, the expertise, or a broad national view. The assumption that training needs to be directed by the needs of industry has been too easily accepted without question, and needs to be re-examined.

The same applies, largely, to peak bodies representing particular groups of employers.

d. Possible further action

- Investigate the needs and preferences of enterprises for the level and nature of their involvement.
- Develop improved support structures which assist industry to engage in recognition arrangements in suitable ways.

3. Some Options

The fundamental question which faces both the managers of the VET system and the key stakeholders is whether, despite its many successes, the faults of the existing system are so basic as to warrant scrapping the system and starting again. This is the view of some critics. It is not ours.

The overall perspective to emerge from existing reports and our own discussions with a range of people knowledgable in the area is that support for the basic principles and concept of NFROT is extremely strong. Moreover, significant efforts have been made by people too numerous to detail over the last four years all aimed at making the system work. To abandon the system now would be to devalue that work and the strong support NFROT retains.

The primary strategy must be reform. It must, however be successful reform. We cannot emphasise strongly enough that the continuous process of piecemeal change, and the perception that much of this has been directed at deflecting criticism rather than making a difference, has produced a level of cynicism—and for some, despair—which is deep and damaging.

In our discussion of the key issues, above, we have identified a number of possible actions which could be taken. Broadly, however, the net effect of these is the reform of the system through either or both of two directions. The system could be reformed by changing its structures and we present three alternatives which could be considered. Additionally, the regulatory approach of NFROT could be modified and we present two options which could be adopted either individually or in combination and a third which represents a modification of the present approach.

Finally, we consider options for responding to the growing concern as to the capacity of the AQF to provide the essential linking role for which it was created.

In addition we recommend that any future decision-making process needs to be based on a sound understanding of what are the goals and needs of the various stakeholders and what they are prepared to do to achieve those goals. We make some suggestions in the following section for areas where a concerted effort to clarify these matters is required.

3.1 Structural Options

a. A single authority (the "Rail Freight" option)

Under this option, NFROT would be restructured in a manner analogous to that operating in the national rail freight system. This would involve all States and Territories agreeing to enact legislation which would transfer components of their powers to a single nationally-owned and operated authority. This authority would operate through agents which might be at national, State or other levels. These might be:

- branches of the national authority and operate somewhat like the existing recognition agencies across providers and industries; or
- sub-contracted agents (ANTA, for example, has suggested ITABs or providers) whose span of responsibility would be strictly defined. (There are, however, some doubts as to the appropriateness and present capacity of ITABs to fulfil this role.)

This approach is most likely to achieve national consistency of interpretation and outcomes.

If such an approach were adopted, it would be important to ensure that the members of any board of management appointed to the authority would have demonstrated expertise in the accreditation of educational programs rather than being appointed to represent sectional interests. By doing so, the authority has the opportunity to be seen as a professional organisation implementing agreed arrangements rather than a forum through which special interests are pursued.

It is, however, an approach which does not, in itself, resolve a number of other issues (e.g. the need to clarify and explain the principles, questions as to the amount of time involved in accreditation) and it may be perceived by some as further distancing the management of VET from the enterprise-level.

b. State systems operating under model legislation (the "Gas appliances" option)

States and Territories would agree to model legislation and associated regulations which implement a consistently-applied set of procedures and criteria for the accreditation of courses and the registration of providers. Recently, governments have agreed to this approach for the regulation and approval of gas appliances. The model should include provision for the automatic recognition of programs accredited in another State or Territory and of providers registered elsewhere. As with option 1, the legislation could provide for certain powers to be exercised by other individuals or organisations.

The effectiveness of this option will depend on the willingness of States/Territories to adopt common procedures and criteria. Even were this to be achieved there remain possibilities that differing interpretations will result in practices differing to some extent. This could be minimised if the agreement provided for regular (possibly, annual) review of decisions and processes and an associated, independent arbitration process which would resolve any inconsistencies.

c. Legislative support for commonality

In this option, States and Territories agree to retain their existing arrangements but to provide legislative or regulatory force to ensure that procedures and criteria which are nationally-agreed are implemented through the existing agencies and structures.

This, clearly, is the option of least change. It is least likely to achieve the degree of national consistency sought by many stakeholders, but may cause the least disruption in a system which has been subject to continuous change throughout its existence.

3.2 Regulatory Options

While presented as separate options, the alternative regulatory approaches (a & b) which follow are not distinct and could be adopted in different degrees or combinations. If these are not acceptable, then option c provides an alternative which modifies our current approach.

a. Focussing on providers

The current arrangements emphasise the regulation of courses and have generally been less stringent in their assessment of providers. We believe that there may be good grounds for reversing the balance.

This option, then, would involve the relevant authority(ies) in refocussing their activities so as to ensure that registered providers had the necessary capabilities to develop, deliver, monitor and review VET courses and programs to agreed standards. In effect all registered providers would then be responsible for the accreditation of their own programs. For small-medium size providers (including many enterprises) this may mean that provisions would need to be made to allow for arrangements in which they operate in association with a larger provider or industry-based organisation which would accept an overall quality assurance role.

This option would entail the development of the principles into clearly defined statements which establish the standard to be demonstrated. The authority(ies) would, in addition, be responsible for a level of compliance auditing which would need to be established.

In the first instance, this option would, likely, reduce the number and diversity of registered providers. It would, however, provide a greater degree of confidence in the quality of recognised training than is currently the case.

b. Focussing on improvement

This option sees the activity of the authority(ies) being refocussed to provide a greater emphasis on monitoring the delivery of courses and programs. This would serve, both, to ensure compliance and as a means of assisting with the cycle of continuous improvement.

Current arrangements are dominated by a "gate-keeping" approach. Considerable effort is expended in ensuring that the documentation of a course or program is sound and that it addresses all the NFROT principles in an acceptable manner. Relatively little effort is expended on ensuring that the course actually delivers quality outcomes. In this regard, the existing processes are more akin to the model of quality control than they are to that of quality assurance.

This option would emphasise the key elements of a quality assurance process. In particular this would entail:

- less emphasis on "getting it right" first time and greater emphasis on continually improving courses and programs;
- greater emphasis on providing clear, supportive documentation which is of assistance to providers;
- greater emphasis on supporting providers in developing and delivering quality education and training.

c. Focussing on consistent criteria

The most consistent critique of the current approach is that the NFROT principles have been subject to wide variations of interpretation. If more fundamental changes to our approach to regulation are unacceptable, it is essential that this level of inconsistency be addressed.

This option, then, would require that substantial work be undertaken by the recognition authorities in collaboration with the Standards and Curriculum Council to develop clear and detailed guidelines for accrediting authorities to use when assessing a proposed course, training program or provider. This work has begun but, it is clear, much more needs to be undertaken to ensure that a suitable level and degree of consistency applies.

These guidelines should be subject to regular monitoring, and modification where required, to ensure that the desired level of consistency is achieved.

3.3 Options for a system of qualifications

Given the nature of the growing concern as to the ability of the AQF to provide the pivotal structure for VET that was intended, the options which appear to be available are limited. Indeed, in our view there are really only two:

- abandon the AQF and begin the process again of identifying a suitable system; or
- maintain the existing agreement, but immediately begin discussions and investigations to determine suitable modifications to the AQF which would provide a sound and effective system. (This could start by initiating research on the Scottish and New Zealand systems, which take an alternative approach to the AQF. Even given the perceived shortcomings of those systems, and even if the AQF is retained in its present form, such a discussion might assist in the alleviation of some of the problems by providing a "mirror" to our practice.)

Given the scope of this paper, it is not appropriate (or feasible within the given timescale) to recommend either one of the alternatives. Clearly to adopt the first involves a significant reversal of a key policy decision on the part of governments. For this reason alone it may be unacceptable. The flaws in the Agreement may, however, be so significant that no other option is viable.

If the second option were accepted, it appears that it would, again, involve significant changes and substantial rethinking on the part of a number of key players. It is not clear, at this stage, what effect this might have on existing decisions on qualifications. Similarly, a range of other factors need to be more completely explored before a sound judgement could be made.

Clearly, however, this is a matter which requires that action is taken.

4. Towards a quality VET system

A high-quality VET system is the common goal of governments and of those working in the system. To that end, a significant array of programs and policies have been introduced since 1990. Central to these has been the set of programs which aim to create a quality system of skills recognition in Australia. The NFROT and AQF agreements have the potential to provide the frameworks within which these programs operate. Their effectiveness is thus critical to the quality of the VET system as a whole.

It is clear from our analysis and the discussion above that we regard both agreements as having fundamental flaws. Equally clearly, however, there is strong support for the intentions which led to their establishment. The task, then, is to make the recognition systems work in ways which support and enhance the total system. Our proposals seek to provide some guidance to policy makers on the hard decisions which we believe must now be taken.

Too much of the decision-making of the past has occurred within time frames and with levels of understanding which have proved inadequate. While we recognise the pressures under which public policy makers are required to act, we also recognise that the history of NFROT and the AQF provide a lesson that should be learnt.

4.1 Possible further action

For these reasons we believe that any further changes need to be based on sound understanding and on clear agreement. The following, then, represent key matters which need to be resolved in moving toward the quality VET system we all seek.

- Critical outstanding issues need to be identified and processes implemented to resolve them. Such processes should involve neutral facilitated arbitration to ensure that all parties feel their views are heard and understood. This will ensure that the distinct interests and concerns of various stakeholder groups will be more clearly defined and communicated.
- Further changes need to be developed with comprehensive consultation with a wide range of stakeholders beyond the peak bodies, with provision of information which goes beyond the promotional in style. Further, proposed changes should be notified well in advance.
- The key role of those responsible "on the ground"—education and training providers—and their legitimate concerns, need to be recognised.
- Means should be found to ensure that time frames for change are reasonable and achievable. For example, it needs to be accepted that progress towards national industry competency standards will be slow without increased government funding.
- A substantial program of monitoring and research should be developed, with reporting-points of research tied in to the time-frame for future decisions on NFROT.

Appendix 1: The NFROT Principles

The following specification of the principles is extracted from *Nationally Recognised Training: Bringing it together.* (VEETAC, 1992)

Accreditation

Principle 1: Identified industry training need or market need.

Accredited courses will be based on competency standards expected in employment [and] will draw on the expert advice of industry and educational bodies at both national and State/Territory levels about their training needs.

Principle 2: Course standards appropriate to requirements of the particular credential.

The standard of the course must match both the credential offered and national guidelines on tertiary award courses.

Principle 3: Competency-based training.

Courses must focus on competencies. Courses must include any competencies endorsed by the National Training Board, where they exist.

Principle 4: Multiple entry and exit.

Accredited courses must recognise prior learning and enable learners to enter and exit the course at various points.

Principle 5: Flexible learning.

Learning may take place in a variety of different environments. Alternative delivery modes must be indicated.

Principle 6: Articulation.

Courses must show how they relate to other courses and include provision for credit transfer.

Principle 7: Customisation of courses.

Courses shall be capable of being adapted to meet the needs of the industry, individuals and other educational institutions.

Principle 8: Promote access and participation.

Accredited courses must be accessible to everyone ... and bridging programs will be available to overcome barriers.

Principle 9: Appropriate assessment.

Assessment methods must measure the attainment of competencies. All assessment principles must be adhered to.

Principle 10: Ongoing monitoring and evaluation.

Courses will be monitored and evaluated regularly.

Credit Transfer

Principle 1: The integrity of accredited courses.

To preserve the integrity of courses, credit must only be awarded where there is a parity of training outcomes.

Principle 2: Credit transfer shall aim to provide the maximum legitimate credit.

This promotes access and helps students complete in less time and without repetition.

Principle 3: The whole training program, or an appreciable part of it.

Credit transfer must consider the whole set of competencies learned in a training program.

Principle 4: Adequate reporting.

Credit transfer will only be awarded if there is documentation that a student's competency level matches the competency requirements of a training program.

Principle 5: Duration.

Credit transfer is valid for the life of the accredited course.

Provider Registration

Principle 1: Providers of recognised training shall be registered.

To offer an accredited course, the provider must be registered to offer that course.

Principle 2: Appropriate staff.

Staff must meet relevant minimum competency standard for trainers.

Principle 3: An adequate and safe environment

The training environment must be adequate for training aims and satisfy both statutory and industrial award requirements.

Principle 4: Responsible and ethical relationships

Students must be aware of the status and outcomes of programs and the rights and responsibilities of students and provides must be understood.

Principle 5: Financial safeguards.

Registered commercial providers must produce evidence that students' funds are fully protected.

Principle 6: Quality control/

Providers must apply for re-registration before registration expires. All registered providers are subject to quality controls.

Assessment

Principle 1: Competency-based training.

Assessment will measure whether competencies have been achieved.

Principle 2: Flexibility in approach.

Assessment may include a variety of methods.

Principle 3: Validity.

Assessment measures must measure what they say they measure.

Principle 4: Reliability.

This means that any trained assessor would reach the same conclusion about achievement of a particular competency.

Principle 5: Recognition of prior learning.

Provision must be made for recognition of prior learning..

Prior Learning

Principle 1: Competence.

The recognition of prior learning will focus on the competencies a person has acquired as a result of both formal and informal training and experience - not how, when or where the learning occurred.

Principle 2: Commitment.

It is important that training providers have a commitment to recognising the prior learning of individuals.

Principle 3: Access.

Every individual must have his or her prior learning recognised.

Principle 4: Fairness.

All participants must be confident that the recognition of prior learning process is fair.

Principle 5: Support.

Individuals ... must be given adequate support.

Appendix 2: Related reports, decisions, etc.

This Appendix has been compiled in order to "track" the development of the National Framework for the Recognition of Training. It is summarised in the Table in section 1.5.

ACTRAC User's Guide to Course Design for Competency-Based Curriculum
September 1992

The Users Guide was prepared by a working party established by ACTRAC to meet its own internal needs for consistent documentation of projects. It had substantially developed the outline of the guide when its relevance to the, then emerging, recognition arrangements was appreciated. Further work then became an activity involving both the ACTRAC working party and the VEETAC Recognition of Training Working Party.

The final document defined a standard format for documenting competency-based courses. It established separate documentation requirements for a course as a whole and for the separate modules which comprised the course. In doing so it established the module as the key building block for course design. Previously most TAFE providers had developed courses around "subjects" which were less free-standing and more topic-oriented than were the new module descriptors. Another key change was that the new descriptors focussed on specifying the *Learning Outcomes* of the module and included less information on teaching process, the balance of the different components, sequencing of learning or related matters. The minimalist approach adopted in the guide has been the subject of continuing controversy among teachers and other educationists. Many simply find that the documentation provides too little guidance to ensure a reasonably consistent interpretation is achieved.

Subsequent to its publication, the guide was used by most State agencies as the basis of their requirements. However a uniform adoption was not achieved.

In 1994 the ACTRAC *User's Guide to Course Design for Competency-Based Curriculum*. 2nd Edition was completed. It provides a revised and expanded version of the 1992 guide with a more detailed explication of the NFROT principles. The additional detail incorporates the agreed minimum requirements accepted by recognition authorities.

The State and Territory recognition authorities were involved in the development of the guide, commented on drafts during its development and particularly influenced aspects of its final content.

First Review of NFROT
July, 1993

Known as the "Rumsey Review", and commissioned by the VEETAC Recognition of Training Working Party, it identified many concerns and proposed several changes to the operation of NFROT.

The report was based on written submissions and interviews with a wide range of interested and involved individuals and organisations. The key findings were that:

- significant inconsistencies existed between States and Territories.
- expectations of reciprocity of recognition had not been met.
- information on NFROT was not widely available.

- the absence of a competency-based system of qualifications created difficulties.
- the slow progress on national competency standards inhibited course development.

The report recommended:

- a number of changes be made to various of the NFROT principles.
- action be taken to clearly define and clarify all NFROT principles.
- staff of accreditation authorities and board members should receive adequate training on NFROT and its implementation.
- recognition authorities should agree on a minimum set of resource requirement specifications.
- regular meetings of recognition authorities should occur to deal with inconsistencies.
- a strategic approach be taken to identifying priority areas of course development.
- policies linking NFROT and industry-based recognition arrangements be developed.
- improved information services about NFROT.
- a policy on inclusion of short courses within NFROT should be agreed
- a long-term strategy for managing and monitoring NFROT be considered.

The Australian Qualifications Framework
December 1993

The initial proposal for a system of qualifications for the VET sector was prepared by the VEETAC Recognition of Training Working Party. Originally to be known as the *National Qualifications Framework (NQF)*, the proposal sought to establish a consistent framework for the post-compulsory sector. It was endorsed by the Ministers in December, 1993 with a proposed commencement date of July, 1994.

Because the consultations leading to the proposal had occurred substantially within the VET sector, considerable concern was expressed by key stakeholders in Higher Education. The AVCC, in particular, were concerned that they had not been adequately consulted and that the NQF could provide a back door means of imposing CBT on universities. Accordingly, a new cross-sectoral group was established to undertake further work. Following more consultations, especially with Higher Education and Schools, some significant changes were made to the original proposals. In particular, the two qualification levels available in both the VET and Higher Education sectors—the Diploma and Advanced Diploma—came to be defined differently in each sector. Thus the essential unity of the framework was lost.

The time taken for these further negotiations led to the introduction of the framework (now renamed the Australian Qualifications Framework, AQF) being delayed until January 1995.

Meeting of recognition authorities
September, 1994

Following the initial evaluation of NFROT, State/Territory recognition authorities began to meet regularly to discuss processes and administrative issues. In 1994, aware of the growing

concerns, the agencies reached agreement on a number of matters aimed at producing a more consistent, national approach. These involved:

- common application forms for accreditation and recognition;
- incorporation of "short courses";
- a national code of practice;
- a national protocol for registering providers who operate across borders; and
- mutual recognition arrangements.

Successful Reform
June, 1994

Drawing on advice from the recently-established Australian National Training Authority (ANTA), Ministers noted that the collection of policies and procedures which, collectively, had become known as the National Training Reform Agenda were achieving mixed results. In many areas concern was growing and, it was noted, critical targets were not being achieved. The Ministers thus directed ANTA to review progress in national training reform and advise on it on suitable courses of action.

The first step toward this goal was ANTA's commissioning of the Allen Consulting Group to carry out a brief but extensive review of the state of play at the time. Their final report known as the "Allen Review", amongst a range of wider issues, noted a number of continuing concerns with NFROT and recommended some significant and urgent changes be made. The report found that most of the concerns noted by Rumsey remained unresolved twelve months later.

Proposals for More Effective Implementation of Training Reform
November 1994

Drawing on the Allen Report, ANTA made a number of proposals which were subsequently agreed to by Ministers. These included redefining the role of the recognition agencies towards one which focuses on quality assurance (QA) & facilitation rather than regulation. It endorsed the decisions taken earlier at the meeting of recognition authorities (see above) and identified a range of further areas which required immediate attention by recognition authorities. These included:

- consistent procedures for evaluating course proposals against the standards.
- guidelines on the customisation of accredited courses.
- ensuring that new training arrangements including those delivered 100% on-the-job are included under NFROT guidelines (see below, re NETTFORCE)

Additionally, ANTA proposed that clear responsibility for the oversight of NFROT should be defined.

The sense of urgency felt by ANTA in seeking to ensure achievement of greater national compliance with the Agreement was their recommendation that Ministers should take legislative action to implement national recognition if required.

NETTFORCE and the new Traineeships
November 1994

In 1994 the Commonwealth produced a White Paper—*Working Nation.* Among a range of initiatives targeted at the long-term unemployed and the restructuring of the labour market, the government established significant funding to increase the number of positions available in Traineeship programs, especially at the lower levels of the ASF. To oversee the introduction of these and to expedite the achievement of the targets set in the paper, the National Employment & Training Taskforce (NETTFORCE) was established. The paper had identified bureaucratic delays in accreditation of courses as a key factor restricting the take-up by employers of Trainees in the past. NETTFORCE was thus provided with interim powers which, in effect, have led to the creation of a parallel accreditation process. A number of courses have been granted interim accreditation under this system.

This possibility led to considerable concerns but was regarded as a temporary arrangement which arose from the urgent need for change. Accordingly, NETTFORCE has been negotiating agreements with State/Territory agencies to ensure more rapid decision-making processes are applied to the accreditation of Traineeship courses.

Establishment of Standards and Curriculum Council
July, 1995

In responding to ANTA's recommendations for providing a clearly-defined responsibility for the coordination of NFROT and a number of related functions, including the AQF, Ministers agreed to the creation of the Standards & Curriculum Council. The Council has been created to assume responsibility for a range of functions some of which were previously the responsibility of ACTRAC and the NTB. Both of these bodies ceased to operate with the creation of the Council. Specifically, it has responsibility for:

- competency standards
- VET aspects of the AQF
- assessment
- national curriculum
- recognition of training (NFROT)

Bibliography

ACTRAC, (1995) *User's Guide to Course Design for Competency-based Curriculum*, Second Edition, ACTRAC Products Ltd, Melbourne

Allen Consulting Group, (1994) *Successful Reform: Competitive skills for Australians and Australian Enterprises.* Report to the Australian National Training Authority. ANTA, Brisbane

Anderson D, (1994) *Blurring the boundaries: TAFE and commercial colleges in the open training market* National Centre for Vocational Education Research, Adelaide.

Australian Chamber of Commerce and Industry, (1993) *Competency based training: How to make it work for you.* ACCI, Melbourne.

Australian National Training Authority, (1994) *Proposals for more effective implementation of training reforms.* ANTA, Brisbane.

Australian National Training Authority, (1994) *Towards a skilled Australia: A national strategy for vocational education and training.* ANTA, Brisbane.

Australian National Training Authority, (1995) *Report from the ANTA Board to the Ministerial Council: The national agenda for vocational education and training.* ANTA, Brisbane

Australian National Training Authority, (1995) *Report of the Recognition of Training Transition Team.* ANTA, Brisbane

Barnett Kate & Brian Hansford, (1995) "Keeping the cowboys out". *Australian Training Review.* March 1995, pp. 13-4.

Barnett, Kate, (1995) *Australian industry and enterprise training providers.* National Centre for Vocational Education Research, Adelaide.

Business Council of Australia, (1994) *Refocussing Training Reform.* BCA, Melbourne

COSTAC, (1990) *A strategic framework for the implementation of a competency-based training system.* Commonwealth/State Training Advisory Committee, Canberra.

McDonald, R. (1995). *Recognition of prior learning. Report on Case studies.* Sydney, Assessment Centre for Vocational Education, NSW TAFE Commission.

MCEETYA, (1995) *Australian Qualifications Framework: Making the most of achievements.* MCEETYA, Canberra

Rumsey David, (1991) *Issues Paper: The national alignment of vocational; education and training credentials to the Australian Standards Framework.* VEETAC Working Party on Recognition of Training, Sydney.

Rumsey, David, (1993) *First review of the National Framework for the Recognition of Training: Final Report*, VEETAC Working Party on the Recognition of Training, Canberra

Senate Employment, Education and Training References Committee, (1995) *Inquiry into the Australian National Training Authority: Discussion Paper*, Australian Senate, Employment, Education and Training References Committee, Canberra

VEETAC, (1991) *CBT Operational Plan.* VEETAC Working Party on the Implementation of CBT, Sydney.

VEETAC, (1991) *National Framework for the Recognition of Training: Report of the VEETAC working party on recognition of training.* VEETAC, Canberra.

VEETAC, (1992) *Assessment of Performance Under Competency- Based Training.* VEETAC Working Party on the Implementation of Competency-Based Training, Sydney.

VEETAC, (1992) *National Framework for the Recognition of Training: A National Framework for a Competitive Australia* VEETAC Working Party on the Recognition of Training, Canberra.

VEETAC, (1992) *National Framework for the Recognition of Training: A National Framework for Training Provider Prestige* VEETAC Working Party on the Recognition of Training, Canberra.

VEETAC, (1992) *Nationally Recognised Training: Bringing it Together.* VEETAC Working Party on the Recognition of Training, Canberra.

VEETAC, (1992) *The Administration of Competency- Based Training.* VEETAC Working Party on the Implementation of Competency-Based Training, Sydney.

VEETAC, (1992) *User's Guide to Course Design for Competency-based Curriculum,* ACTRAC Products Ltd, Melbourne.

VEETAC, (1993) *Arrangements for the recognition of prior learning in Australia.* VEETAC, Canberra.

VEETAC, (1994) *The National Qualifications Framework.* VEETAC Working Party on Recognition of Training, Melbourne.